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January 28, 2024

BY ELECTRONIC MAIL & ECF

The Honorable Victor Marrero
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v Villafane, Juan Kuang*
21 cr 93 (VM)

Dear Judge Marrero:

Please allow this letter as a motion to amend Juan Kuang's conditions of pretrial release bond to remove the condition of curfew with location monitoring. His pretrial services officer, Marlon Ovalles supports this application and recommends the above amendment to Mr. Kuang's pretrial release. The Government defers to the position of Senior Pretrial Officer Ovalles.

On April 8, 2024 Mr. Kuang was released on a \$150,00 bond with conditions, *inter alia*, of home detention and with GPS monitoring, secured by cash of \$5,000, and signatures of seven suretors- consisting of family members and his supervisor from work. See Dkt. Entry # 132, #166. .

On August 28, 2024, upon application of counsel, with the support of Pretrial Officer Marlon Olivares, to whom the Government deferred, the Court amended Mr. Kuang's conditions of bond to a curfew as directed by Pretrial Services with location monitoring. See Dkt. Entry # 214.

Mr. Kuang now comes before the Court for a further amendment to his conditions of pretrial release to eliminate condition of a curfew with location monitoring and substitute reporting to Pretrial as directed by his Pretrial Officer.

As confirmed by Officer Ovalles, Mr. Kuang is doing well on release.

1. He has maintained employment;

2. He is enrolled in College-he has completed his first term of College and doing very well;
3. He graduated from SDNY Focus Forward program;
4. He has attended all his treatment sessions;
5. His drug tests have been negative for illegal substances;
6. He is paying down his child support arrears;
7. He cooperated fully with his pretrial officer-attending all meetings with his Officer Ovalles and providing any documents requests by his officer;
8. He supports his wife and one year old son;
9. He assists his wife with childcare responsibilities.

Mr. Kuang's compliance with the terms of his pretrial release demonstrates that he can be trusted to adhere to the conditions of release as he now requests.

Wherefore, I respectfully request the Court amend Mr. Kuang's conditions of bond, removing the condition of a curfew as directed by pretrial services with location monitoring and amending his conditions of pretrial release to reporting as directed by Pretrial. All other conditions of bond previously ordered shall remain in full force and effect.

Respectfully submitted,

/s/

Donna R. Newman

Cc: Sr. PTO Marlon Ovalles

AUSA Michael Herman

AUSA Thomas Wright

Request GRANTED.

Defendant's bond conditions of curfew with location monitoring are hereby removed. Defendant shall report directly to Pretrial, as directed by his Pretrial Officer. All other conditions of bond remain in full force and effect.

SO ORDERED.

1/31/2025

DATE


VICTOR MARRERO, U.S.D.J.